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May 7, 2021

VIA ECF

Hon. Vernon S. Broderick
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Galeana, *et al.* v. Mahasan Inc., *et ano.*
Case No.: 14-cv-03625 (VSB) (KNF)

Your Honor:

This office represents Plaintiffs in the above-referenced matter. I write to respectfully request an extension of time to file Plaintiffs' Motion for a Default Judgment ("Default Motion"). Pursuant to the Court's order dated April 30, 2021, the current deadline to file the Default Motion is May 7, 2021. Plaintiff is seeking an extension to file the Default Motion to May 12, 2021. This is the first request of its kind.

The reason for this request is that our office is awaiting to receive a signed declaration from one of the movants, which we anticipate receiving by early next week.

Accordingly, Plaintiffs respectfully request the Court to grant their request for a brief extension of time to file the Default Motion, from May 7, 2021 to May 12, 2021.

Plaintiffs thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ William K. Oates
William K. Oates Esq.
Michael Faillace & Associates, P.C.
Attorneys for Plaintiffs